

RAT # 6

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MAY 21 2020

U.S. DISTRICT COURT MPLS

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Tony Terrell Robinson,

Case No.: 0:17-CV-00437-DSD-KMM

Plaintiff,

vs.

**DEFENDANTS CENTURION  
OF MINNESOTA, LLC AND  
JEANNE L. LUCK, LPN'S,  
RESPONSES TO PLAINTIFF'S  
SECOND SET OF  
REQUESTS FOR ADMISSION**

Stephen Dannewitz, M.D., Advanced  
Medical Imaging, Inc., Ranjiv Saini, M.D.,  
Centurion of Minnesota, LLC, Jeanne  
Luck, LPN,

Defendants.

TO: Plaintiff [*Pro Se*] Tony Terrell Robinson, Inmate ID: 18099-041, Federal  
Correctional Institution, P.O. Box 5000, Greenville, Illinois 62246-5000, and his  
attorney Zorislav R. Leyderman, The Law Office of Zorislav R. Leyderman, 222  
South 9th Street, Suite 1600, Minneapolis, MN 55402.

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendants  
Centurion of Minnesota, LLC and Jeanne Luck, LPN respond to Plaintiff's Second Set of  
Requests for Admission as follows:

**ANSWERS TO REQUESTS FOR ADMISSION**

**REQUEST NO. 29:** Admit the genuineness of medical records from 4-14-14, 4-15-  
14, 4-17-14, 4-28-14, 4-30-14, and 5-6-14.

**ANSWER:** Defendants object to this Request as untimely, because the Request was not  
commenced in time to be completed by the discovery cutoff date of March 14, 2020 (See  
ECF No. 185, 215). Defendants further object to this Request as exceeding the maximum  
number of Requests for Admissions permitted by the Court's Scheduling Order dated  
August 23, 2019 (ECF No. 185). Defendants further object to this Interrogatory on the  
ground that it is calling for a legal conclusion. Subject to and without waiving any  
objections, admit. Defendants have no reason to question the genuineness of Plaintiff's  
medical records.

**REQUEST NO. 30:** Admit that you, Jeanne Luck, LPN, is the author of the medical record encounter on 4-15-14.

**ANSWER:** Defendants object to this Request as untimely, because the Request was not commenced in time to be completed by the discovery cutoff date of March 14, 2020 (See ECF No. 185, 215). Defendants further object to this Request as exceeding the maximum number of Requests for Admissions permitted by the Court's Scheduling Order dated August 23, 2019 (ECF No. 185). Subject to and without waiving any objections, deny.

Dated: March 27, 2020

**LARSON • KING, LLP**

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